

Exhibit B

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
Sandy Ricketts**DEFENDANTS**
AEEG Live Productions, LLC(b) County of Residence of First Listed Plaintiff New Jersey
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Defendant Los Angeles, CA

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.(c) Attorneys (Firm Name, Address, and Telephone Number)
Jeffrey Lessin, Esquire
1515 Market Street, Suite 714, Philadelphia, PA 19102
215-599-1400Attorneys (If Known)
Brian J. McNulty, Esquire
620 Freedom Business Center, Suite 300
King of Prussia, PA 19406 6100-354-8271**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- | | |
|--|---|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORECLOSURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 500 Securities/Commodities/Exchange <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
		PERSONAL PROPERTY		<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act
				<input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
				<input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	IMMIGRATION	FEDERAL TAX SUITS
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
		Habeas Corpus: <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- | | | | | | |
|--|--|--|---|--|---|
| <input type="checkbox"/> 1 Original Proceeding | <input checked="" type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) | <input type="checkbox"/> 6 Multidistrict Litigation |
|--|--|--|---|--|---|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

VI. CAUSE OF ACTION

Brief description of cause:

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

9/15/15

SIGNATURE OF ATTORNEY OF RECORD

Brian J. McNulty /s/

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA – DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff 514 5th Street, Somers Point, NJ

Address of Defendant AEG Live Productions, LLC, 5750 Wilshire Boulevard, Suite 501, Los Angeles, CA 90036

Place of Accident, Incident or Transaction Philadelphia, PA

(Use Reverse Side for Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more if its stock?
 (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 8.1(a)) Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
 Yes No
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
 Yes No
3. Does this case involve the validity or infringement of a patent already in suit or any earlier number case pending or within one year previously terminated action in this court?
 Yes No
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
 Yes No

CIVIL: (Place ✓ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Patent
6. Labor-Management Relations
7. Civil Rights
8. Habeas Corpus
9. Securities Act(s) Cases
10. Social Security Review Cases
11. All other Federal Question Cases
 (Please specify)

B. Diversity Jurisdiction Cases

1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify)
7. Products Liability
8. Products Liability – Asbestos
9. All other Diversity Cases
 (Please specify)

ARBITRATION CERTIFICATION

(Check appropriate Category)

I, Brian J. McNulty counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE 9/10/15

Brian J. McNulty/s/
 Attorney-at-Law

201275

Attorney I.D. #

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE 9/10/15

Brian J. McNulty/s/
 Attorney-at-Law

201275

Attorney I.D. #

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA – DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff 514 5th Street, Somers Point, NJ

Address of Defendant AEG Live Productions, LLC, 5750 Wilshire Boulevard, Suite 501, Los Angeles, CA 90036

Place of Accident, Incident or Transaction Philadelphia, PA

(Use Reverse Side for Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more if its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 8.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

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Case Number: _____ Judge: _____ Date Terminated: _____

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1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
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10. Social Security Review Cases
11. All other Federal Question Cases

(Please specify)

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1. Insurance Contract and Other Contracts
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3. Assault, Defamation
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5. Motor Vehicle Personal Injury
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9. All other Diversity Cases

(Please specify)

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(Check appropriate Category)

I, Brian J. McNulty, counsel of record do hereby certify:

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Brian J. McNulty/s/
Attorney-at-Law

201275

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DATE 9/10/15

Brian J. McNulty/s/
Attorney-at-Law

201275

Attorney I.D. #

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

SANDY RICKETTS :
v. :
AEG LIVE PRODUCTIONS, LLC, et al. : CIVIL ACTION NO.:
:

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS: ()

- (a) Habeas Corpus — Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security — Cases requesting review of a decision of the Secretary of Health and Human() Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration — Cases required to be designated for arbitration under Local Civil Rule 53.2. (X)
- (d) Asbestos — Cases involving claims for personal injury or property damage from exposure to() asbestos. ()
- (e) Special Management — Cases that do not fall into tracks (a) through (d) that are commonly() referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management — Cases that do not fall into any one of the other tracks. ()

9/10/15 Brian J. McNulty, Esquire AEG Live Productions, LLC
Date Attorney-at-law Attorney for Defendant

610-354-8271 610-354-8299 bjmcnulty@mdwgc.com
Telephone FAX Number E-Mail Address

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SANDY RICKETTS

v. : CIVIL ACTION NO.:
CITY OF PHILADELPHIA :
c/o CITY LAW DEPARTMENT and :
COMCAST SPECTACOR, LP and :
COMCAST SPECTACOR, INC. and :
GLOBAL SPECTRUM, LP and :
GLOBAL SPECTRUM, INC. and :
AEG LIVE PRODUCTIONS, LLC :

NOTICE OF REMOVAL

TO THE HONORABLE JUDGES OF THE SAID DISTRICT COURT OF THE UNITED STATES:

Defendant AEG Live Productions, LLC in the above captioned matter file this Notice of Removal of the case from the Court of Common Pleas of Philadelphia County, in which it is now pending, to the United States District Court for the Eastern District of Pennsylvania, and in support thereof, aver as follows:

1. This is a premises liability action that was commenced on February 25, 2015 by way of Complaint filed in the Court of Common Pleas of Philadelphia County, PA, Docket No. August Term, 2014 No. 03168. A copy of that Complaint is attached hereto and marked as Exhibit "A".

2. On July 8, 2015, Plaintiff, Sandy Ricketts, filed a separate action in the Court of Common Pleas of Philadelphia County, PA docketed as July Term, 2015 No. 00613. A copy of that Complaint is attached hereto and marked as Exhibit "B".

3. Both of these Complaints filed in the Court of Common Pleas of Philadelphia County, PA by the Plaintiff are based upon the same incident which allegedly occurred on July 17, 2013 at the Wells Fargo Center in Philadelphia, PA. Accordingly, both actions arise out of the same incident.

4. On August 18, 2015, the Defendants in the Complaint filed by the Plaintiff on July 8, 2015, filed a Notice of Removal with the United States District Court for the Eastern District of Pennsylvania.

5. Defendant AEG Live Productions, LLC hereby exercise its rights under the provisions of 28 U.S.C. §1441, et. seq. and based upon complete diversity of citizenship between the parties, to remove this action from the Court of Common Pleas of Philadelphia, PA, in which this case is presently pending.

6. The present suit is removal from the State Court to the Eastern District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. §1332(a)(1) and §1441(a) because the controversy in this action is between Plaintiff, a citizen of the State of New Jersey, and Defendants, all of whom are citizens of a foreign state. Specifically, diversity is established as follows:

- a. Plaintiff, Sandy Ricketts resides at 514 5th Street, Somers Point, NJ, and is a citizen of the State of New Jersey;
- b. AEG Live Products, LLC is a corporation doing business in the Commonwealth of Pennsylvania with its principal place of business located in the State of California.
- c. The City of Philadelphia is a political subdivision, a city of the first class, existing in the Commonwealth of Pennsylvania;

- d. Comcast Spectacore, LP and Comcast Spectacore, Inc. are corporations organized and doing business in the Commonwealth of Pennsylvania with principal place of business located at 3601 S. Broad Street, Philadelphia, PA 19148;
- e. Global Spectrum, LP is a limited partnership organized and doing business in the Commonwealth of Pennsylvania with a principal place of business located at 3601 S. Broad Street, Philadelphia, PA 19148;
- f. Global Spectrum, Inc. is a corporation organized and doing business in the Commonwealth of Pennsylvania with a principal place of business located at 3601 S. Broad Street, Philadelphia, PA 19148;

7. Accordingly, this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1332 because there is diversity of citizenship and because the assertions made in the Notice of Removal filed with this Court on August 18, 2015, as well as the allegations made by the Plaintiff in the underlying Complaint, the matter in controversy exceeds the sum or value of \$75,000, exclusive of costs.

8. Pursuant to the provisions of 28 U.S.C. §1446(a), Defendants have attached herewith and incorporate by reference, a copy of the Complaint filed in the Philadelphia Court of Common Pleas in this action.

9. Defendant will provide immediate notice of the filing of this Notice to Plaintiff as required by 28 U.S.C. §1446(d).

10. Defendant will file a certified copy of this Notice with the Prothonotary of the Court of Common Pleas of Philadelphia County as required by 28 U.S.C. §1446(d).

WHEREFORE, Defendant requests that the action presently pending in the Court of Common Pleas of Philadelphia County be removed to the United States District Court for the Eastern District of Pennsylvania.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

By: Brian J. McNulty /s/
BRIAN J. MCNULTY, ESQUIRE
Attorney for Defendant,
AEG Live Productions, LLC
PA Identification No.: 201275
620 Freedom Business Center, Suite 300
King of Prussia, PA 19406
(610) 354-8271

Date: 9/10/15

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SANDY RICKETTS	:	
v.	:	
	:	CIVIL ACTION NO.:
CITY OF PHILADELPHIA	:	
c/o CITY LAW DEPARTMENT and	:	
COMCAST SPECTACOR, LP and	:	
COMCAST SPECTACOR, INC. and	:	
GLOBAL SPECTRUM, LP and	:	
GLOBAL SPECTRUM, INC. and	:	
AEG LIVE PRODUCTIONS, LLC	:	

NOTICE

TO: SANDY RICKETTS
c/o Jeffrey R. Lessin, Esquire
Jeffrey R. Lessin & Associates, P.C.
1515 Market Street, Suite 714
Philadelphia, PA 19102

PLEASE TAKE NOTICE that Defendant has filed a Notice in the United States District Court for the Eastern District of Pennsylvania for removal of an action now pending in the Court of Common Pleas of Philadelphia, PA captioned Sandy Ricketts v. City of Philadelphia, Comcast Spectacore, et al., August Term, 2014 No. 3168.

Further, take notice that the Defendants have at the same time filed electronically with the United States District Court for the Eastern District of Pennsylvania, a copy of the Complaint

which was filed and entered in the Court of Common Pleas of Philadelphia County. A copy of said Notice of Removal is attached to this Notice and is hereby served on you.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

By: Brian J. McNulty /s/
BRIAN J. MCNULTY, ESQUIRE
Attorney for Defendant,
AEG Live Productions, LLC
PA Identification No.: 201275
620 Freedom Business Center, Suite 300
King of Prussia, PA 19406
(610) 354-8271

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SANDY RICKETTS

v. : CIVIL ACTION NO.:
CITY OF PHILADELPHIA :
c/o CITY LAW DEPARTMENT and :
COMCAST SPECTACOR, LP and :
COMCAST SPECTACOR, INC. and :
GLOBAL SPECTRUM, LP and :
GLOBAL SPECTRUM, INC. and :
AEG LIVE PRODUCTIONS, LLC :

PROOF OF FILING

TO THE CLERK OF COURT:

BRIAN J. McNULTY, ESQUIRE, hereby certifies that a copy of the foregoing Notice of Removal will be filed with the Prothonotary of the Philadelphia County Court of Common Pleas immediately upon receipt of the electronic filing from the United States District Court for the Eastern District of Pennsylvania.

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

By: Brian J. McNulty /s/
BRIAN J. McNULTY, ESQUIRE
Attorney for Defendant,
AEG Live Productions, LLC
PA Identification No.: 201275
620 Freedom Business Center, Suite 300
King of Prussia, PA 19406
(610) 354-8271

VERIFICATION

I, Brian J. McNulty, Esquire verify that the facts set forth in Defendant's Notice of Removal are true to the best of his knowledge, information and belief. If the above statements are not true, the deponent is subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Brian J. McNulty /s/

BRIAN J. McNULTY

CERTIFICATE OF SERVICE

I, BRIAN J. McNULTY, hereby certify that I served Defendant AEG Live Productions, LLC's Notice of Removal by electronically filing upon all parties listed below:

Jeffrey R. Lessin, Esquire
Mark T. Richter, Esquire
Jeffrey R. Lessin & Associates, P.C.
1515 Market Street, Suite 714
Philadelphia, PA 19102

Christine Giuliano, Esquire
Naulty, Scaricamazza & McDevitt
One Penn Center, Suite 750
1617 JFK Boulevard
Philadelphia, PA 19103

Karen Elizabeth Rompala, Esquire
Law Department
City of Philadelphia
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

By: Brian J. McNulty /s/
BRIAN J. McNULTY, ESQUIRE
Attorney for Defendant,
AEG Live Productions, LLC
PA Identification No.: 201275
620 Freedom Business Center, Suite 300
King of Prussia, PA 19406
(610) 354-8271

Date: 9/10/15

EXHIBIT "A"

JEFFREY R. LESSIN & ASSOCIATES, P.C.
BY: JEFFREY R. LESSIN, ESQUIRE
I.D. #: 43801
BY: MARK T. RICHTER, ESQUIRE
I.D. #: 45195
1515 MARKET STREET, SUITE 714
PHILADELPHIA, PA 19102
215-599-1400

MAJOR JURY ASSESSMENT OF
DAMAGES HEARING REQUIRED.
JURY TRIAL DEMANDED

SANDY RICKETTS
514 Fifth Street
Somers Point New Jersey 08244

ATTORNEYS FOR PLAINTIFFS
COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY

vs.
CITY OF PHILADELPHIA
c/o CITY LAW DEPARTMENT
1515 ARCH STREET 14th FL.
Philadelphia, PA 19102
and

AUGUST TERM, 2014

COMCAST SPECTACOR, LP
3601 S. Broad Street
Philadelphia, PA 19148
and

COMCAST SPECTACOR, INC.
3601 S. Broad Street
Philadelphia, PA 19148
and

GLOBAL SPECTRUM, LP
3601 S. Broad Street
Philadelphia, PA 19148
and

No.: 03168

GLOBAL SPECTRUM, INC.
3601 S. Broad Street
Philadelphia, PA 19148
and

AEG LIVE PRODUCTIONS, LLC
5750 Wilshire Boulevard, Suite 501
Los Angeles, CA 90036-3697



CIVIL ACTION – AMENDED COMPLAINT - NOTICE TO DEFEND
2S - PREMISES LIABILITY- SLIP AND FALL

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association

Lawyer Referral Service

One Reading Center

Philadelphia, PA 19107

215-238-1701

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINA SIGUIENTES, USTED TIENE VIENTE (20) DIAS, DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICATION, HACE FALTA ASENTAR UNA COMPARENCIA ESCRITA O EN FORMA ESCRITA SUS DEFNSAS O SUS OBJECCIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION ADEMÁS, LA CORTE PUEDE DICIDIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES O OTROS DERECHOS IMPORTANTED PARA USTED. LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATEMENTE. SI NO TIENE ABOGADO O SI O TIENE EL DINERO SUFFICIENTE DE TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Asociacion de Liceneados de Filadephia

Servicio de Referencia e Informacion Legal

One Reading Center

Philadelphia, Pennsylvania 19107

(215) 238-1701

JEFFREY R. LESSIN & ASSOCIATES, P.C.
BY: JEFFREY R. LESSIN, ESQUIRE
I.D. #: 43801
MARK T. RICHTER, ESQUIRE
I.D. #: 45195
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ATTORNEYS FOR PLAINTIFF

vs.
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c/o CITY LAW DEPARTMENT
1515 ARCH STREET 14th FL.
Philadelphia, PA 19102

AUGUST TERM, 2014

and
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3601 S. Broad Street
Philadelphia, PA 19148

and
COMCAST SPECTACOR, INC.
3601 S. Broad Street
Philadelphia, PA 19148

and
GLOBAL SPECTRUM, LP
3601 S. Broad Street
Philadelphia, PA 19148

No.: 03168

and
GLOBAL SPECTRUM, INC.
3601 S. Broad Street
Philadelphia, PA 19148

and
AEG LIVE PRODUCTIONS, LLC
5750 Wilshire Boulevard, Suite 501
Los Angeles, CA 90036-3697

CIVIL ACTION - AMENDED COMPLAINT
2S - PREMISES LIABILITY- SLIP AND FALL

1. Plaintiff, **SANDY RICKETTS**, is an adult individual residing at 514 Fifth Street, Somers Point, NJ 08244.

2. Defendant **CITY OF PHILADELPHIA** is a political subdivision, a City of the first class, existing in the Commonwealth of Pennsylvania, which has its legal offices at the address set forth in the above caption.
3. Defendant **COMCAST SPECTACOR, LP** is a limited partnership, partnership, or other business entity, organized and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 3601 S. Broad Street, Philadelphia, PA 19148.
4. Defendant **COMCAST SPECTACOR, INC.** is a corporation or other business entity organized and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 3601 S. Broad Street, Philadelphia, PA 19148.
5. Defendant **GLOBAL SPECTRUM, LP** is a limited partnership, partnership, or other business entity, organized and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 3601 S. Broad Street, Philadelphia, PA 19148.
6. Defendant **GLOBAL SPECTRUM, INC.** is a corporation or other business entity organized and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 3601 S. Broad Street, Philadelphia, PA 19148.
7. Defendant **AEG LIVE PRODUCTIONS, LLC** is a corporation or other business entity organized and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 5750 Wilshire Boulevard, Suite 501, Los Angeles, CA 90036-3697.
8. At all times material hereto, Defendant **CITY OF PHILADELPHIA** owned,

possessed, controlled and/or maintained the real property known as the Wells Fargo Center located at 3601 S. Broad Street, Philadelphia, PA 19148 (hereinafter alternatively referenced as the "premises").

9. At all times material hereto, Defendants **COMCAST SPECTACOR, LP** and/or **COMCAST SPECTACOR, INC.** owned and/or co-owned, and/or leased, possessed, managed, controlled and/or maintained the real property known as the Wells Fargo Center located at 3601 S. Broad Street, Philadelphia, PA 19148.

10. At all times material hereto, Defendants **GLOBAL SPECTRUM, LP** and/or **GLOBAL SPECTRUM, INC.** managed, possessed ,controlled and/or maintained the real property known as the Wells Fargo Center located at 3601 S. Broad Street, Philadelphia, PA 19148.

11. At all times material hereto, Defendants **AEG LIVE PRODUCTIONS, LLC** managed, licensed, operated, possessed , controlled and/or maintained the real property known as the Wells Fargo Center located at 3601 S. Broad Street, Philadelphia, PA 19148.

12. On July 17, 2013, Plaintiff **SANDY RICKETTS** was a patron and a business invitee who was lawfully in the Defendants' aforesaid premises while attending a concert.

13. At all times material hereto, the Defendants acted by and through their agents, servants, workmen and/or employees all of whom were acting within the scope of their agency and/or authority.

14. At all times material hereto, each of the Defendants had a duty to keep the aforesaid premises free of unreasonably hazardous defects and conditions and safe for

business invitees such as the Plaintiff.

15. On the aforesaid date, the Defendants, by and through their agents, servants, workmen and/or employees, knew and/or should have known of the existence of the hazardous condition of the premises as described below.

16. On July 17, 2013, and for a period of time prior thereto, there existed in the walkways of the aforesaid premises, obstructions, defects and irregularities, particularly in the form of electrical cables and/or wires that had been placed or strung about and across the said walkways creating a danger, menace, nuisance, trap and/or trip hazard to persons lawfully upon said premises.

17. On July 17, 2013, the Plaintiff, **SANDY RICKETTS**, was caused to trip, stumble and fall as a result of coming in contact with the aforementioned defective and hazardous condition then existing upon the aforesaid premises, and to suffer serious injuries more fully hereinafter described.

COUNT I
SANDY RICKETTS vs. ALL DEFENDANTS

18. The averments of paragraphs one (1) through seventeen (17), inclusive, are incorporated herein and made a part hereof.

19. The Defendants, individually and/or jointly, by and through their agents, servants, workmen and/or employees, acting in the course of their employment and within the scope of their authority, knew or should have known of the existence of the aforementioned defect prior to the Plaintiff's fall and the Defendants had a duty to correct, remedy, repair, warn of and/or eliminate the said defect.

20. The carelessness and negligence of the Defendants consisted of the following:

- a. Failing to properly inspect the said premises and adjacent areas;
- b. Failing to warn pedestrians of the dangerous condition of the walkway of which the Defendants were aware or should have been aware;
- c. Failing to select and hire competent contractors to maintain the walkways, and/or walking area in said premises;
- d. Failing to maintain the premises and/or walkways in a condition which would protect and safeguard individuals lawfully upon the premises and prevent them from falling;
- e. Allowing and causing the electrical cables or wires on the aforesaid premises to extend across walkways and to constitute a menace, danger, nuisance, trap and/or trip hazard to persons lawfully on the premises;
- f. Allowing a condition to exist which was in violation of the ordinances of the municipality and the Commonwealth of Pennsylvania related to safety requirements for walking surfaces;
- g. Failing to maintain walkways in compliance with the laws of the municipality and the Commonwealth of Pennsylvania;
- h. Failing to keep the walkways free of defects obstructions and debris;
- i. Failing to effectively clear the walkways of the above-mentioned area of wires, cables, folding chairs and/or debris before the arrival of business invitees;
- j. Failing to eliminate the dangerous condition and to guard or warn

- pedestrians of the hazard at the premises;
- i. Failing to maintain the premises reasonably free from trip hazards along foreseeable pedestrian paths at, near, or adjacent to the means of ingress and egress to the premises and its seating areas;
 - m. Allowing a condition to exist which was in violation of the ordinances and/or codes of the municipality and/or the Commonwealth of Pennsylvania, and/or applicable national and international codes in relation to walkways on commercial properties and/or properties open to the public;
 - n. Breaching their duty to monitor the site conditions;
 - o. Failing to perform reasonable and timely site inspections; and
 - p. Failing to appropriately provide ushers or security personnel to assist concert goers who were heading toward their seats.

21. By reason of the aforesaid negligence of the Defendants as stated above, the Plaintiff, **SANDY RICKETTS**, suffered severe and permanent injuries to her person, including but not limited to: left scaphoid fracture; a laceration of her lower lip requiring surgical repair; contusions and sprains of her left wrist and hand; injuries to her teeth; nervous shock and aggravation and/or exacerbation of all known and unknown preexisting medical conditions. The Plaintiff, **SANDY RICKETTS**, suffered severe aches pains, mental anxiety and anguish, and a severe shock to her entire nervous system, and other injuries the full extent of which are not yet known. She has in the past and will in the future undergo severe pain and suffering and will in the future be unable to attend to her usual duties and occupation, all to her great financial detriment and loss.

The Plaintiff, **SANDY RICKETTS**, believes and therefore avers that her injuries are permanent in nature.

22. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has been compelled, in order to effectuate a cure for the aforesaid injuries, to expend large sums of money for surgeries, medicine, therapy and medical attention and may be required to expend additional sums for the same purposes in the future.

23. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has been prevented from attending to her usual and daily activities and duties, and may be so prevented for an indefinite time in the future, all to her great financial detriment and loss.

24. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has suffered physical pain and mental anguish and humiliation and she may continue to suffer same for an indefinite period of time in the future.

WHEREFORE, Plaintiff, **SANDY RICKETTS**, demands damages of the Defendants, jointly and severally herein, in a sum in excess of **FIFTY THOUSAND (\$50,000.00) DOLLARS**, plus costs.

JEFFREY R. LESSIN & ASSOCIATES, P.C.

BY: Jeffrey R. Lessin

JEFFREY R. LESSIN, ESQUIRE
MARK T. RICHTER, ESQUIRE
Attorneys for Plaintiff

Date: February 3, 2015

VERIFICATION

Sandra L Ricketts , state that I am the Plaintiff in this matter and that the statements made in the foregoing Amended Complaint are true and correct to the best of my knowledge, information and belief; and that this statement is made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

Sandra Ricketts

EXHIBIT "B"

JEFFREY R. LESSIN & ASSOCIATES, P.C.
BY: JEFFREY R. LESSIN, ESQUIRE
I.D. #: 43801
BY: MARK T. RICHTER, ESQUIRE
I.D. #: 45195
1515 MARKET STREET, SUITE 714
PHILADELPHIA, PA 19102
215-599-1400

SANDY RICKETTS
514 Fifth Street
Somers Point New Jersey 08244

vs.

BIEBER TIME TOURING, LLC
c/o TSG FINANCIAL MANAGEMENT, LLC
133 Peachtree Street, Suite 4070
Atlanta, GA 30303

and

BIEBER TIME MERCHANDISE, LLC
c/o TSG FINANCIAL MANAGEMENT, LLC
133 Peachtree Street, Suite 4070
Atlanta, GA 30303

and

JUSTIN BIEBER
c/o TSG FINANCIAL MANAGEMENT, LLC
133 Peachtree Street, Suite 4070
Atlanta, GA 30303

and

PATRICIA MALLETTTE
c/o TSG FINANCIAL MANAGEMENT, LLC
133 Peachtree Street, Suite 4070
Atlanta, GA 30303

This is NOT an ARBITRATION MATTER.
ASSESSMENT OF DAMAGES REQUIRED.
JURY TRIAL DEMANDED

ATTORNEYS FOR PLAINTIFF
COURT OF COMMON PLEASES
OF PHILADELPHIA COUNTY

Filed and attested by
PROTHONOTARY
OCT 10 2015 PM
SIXTY FIFTH COURT OF COMMON PLEASES

CIVIL ACTION - COMPLAINT - NOTICE TO DEFEND
2S - PREMISES LIABILITY- SLIP AND FALL
NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
Lawyer Referral and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-1701

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINA SIGUIENTES, USTED TIENE VIENTE (20) DIAS, DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICATION. HACE FALTA ASENTAR UNA COMPARENCIA ESCRITA O EN FORMA ESCRITA SUS DEFNSAS O SUS OBJECCIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION ADEMAS, LA CORTE PUEDE DICIDIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES O OTROS DERECHOS IMPORTANTED PARA USTED. LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATEMENTE. SI NO TIENE ABOGADO O SI O TIENE EL DINERO SUFFICIENTE DE TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL

Asociacion de Liceneados de Filadelfia
Servicio de Referencia e Informacion Legal
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-1701

JEFFREY R. LESSIN & ASSOCIATES, P.C.
BY: JEFFREY R. LESSIN, ESQUIRE
I.D. #: 43801
BY: MARK T. RICHTER, ESQUIRE
I.D. #: 45195
1515 MARKET STREET, SUITE 714
PHILADELPHIA, PA 19102
215-599-1400

This is not an Arbitration Matter
Assessment of Damages Required
Jury Trial Demanded

<p>SANDY RICKETTS 514 Fifth Street Somers Point New Jersey 08244 vs. BIEBER TIME TOURING, LLC c/o TSG FINANCIAL MANAGEMENT, LLC 133 Peachtree Street, Suite 4070 Atlanta, GA 30303 and BIEBER TIME MERCHANDISE, LLC c/o TSG FINANCIAL MANAGEMENT, LLC 133 Peachtree Street, Suite 4070 Atlanta, GA 30303 and JUSTIN BIEBER c/o TSG FINANCIAL MANAGEMENT, LLC 133 Peachtree Street, Suite 4070 Atlanta, GA 30303 and PATRICIA MALLETT c/o TSG FINANCIAL MANAGEMENT, LLC 133 Peachtree Street, Suite 4070 Atlanta, GA 30303</p>	<p>ATTORNEYS FOR PLAINTIFF</p> <p>: COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY</p> <p>:</p> <p>: JULY TERM, 2015</p> <p>:</p> <p>No. :</p>
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CIVIL ACTION - COMPLAINT - NOTICE TO DEFEND
2S - PREMISES LIABILITY- SLIP AND FALL

CIVIL ACTION - COMPLAINT

1. Plaintiff, **SANDY RICKETTS**, is an adult individual residing at 514 Fifth Street, Somers Point, NJ 08244.
2. Defendant **BIEBER TIME TOURING, LLC**, is a limited partnership, partnership,

or other business entity, organized in the State of Delaware and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303.

3. Defendant **BIEBER TIME MERCHANDISE, LLC**, is a limited partnership, partnership, or other business entity, organized in the State of Delaware and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303.

4. Defendant **JUSTIN BIEBER** is an adult individual, residing in Stratford, Ontario, Canada. At all times relevant hereto, **JUSTIN BIEBER** was an owner, manager, officer, partner, principal or employee of the business entities known as **BIEBER TIME TOURING, LLC** and/or **BIEBER TIME MERCHANDISE, LLC**, who regularly conducted business in Philadelphia, Pennsylvania, and who was a signatory to a contract with AEG LIVE, LLC, dated January 31, 2012 and amendments thereof dated December 13, 2012 and April 18, 2013, which pertained to a series of concert performances identified as "The Justin Bieber: Believe" tour and which applied to a performance that took place at the Wells Fargo Center in Philadelphia, Pennsylvania on July 17, 2013. Defendant **JUSTIN BIEBER** is amenable to service of process at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303, c/o TSG Financial Management, LLC.

5. Defendant **PATRICIA MALLETTÉ** is an adult individual, residing in Stratford, Ontario, Canada. At all times relevant hereto, **PATRICIA MALLETTÉ** was an owner, manager, officer, partner, principal or employee of the business entities known as **BIEBER TIME TOURING, LLC** and/or **BIEBER TIME MERCHANDISE, LLC**, who regularly conducted business in Philadelphia, Pennsylvania, and who was a signatory to a contract

with AEG LIVE, LLC, dated January 31, 2012 which pertained to a series of concert performances identified as "The Justin Bieber: Believe" tour and which applied to a performance that took place at the Wells Fargo Center in Philadelphia, Pennsylvania on July 17, 2013. Defendant **PATRICIA MALLETTE** is amenable to service of process at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303, c/o TSG Financial Management, LLC.

6. On July 17, 2013, Plaintiff **SANDY RICKETTS** was a patron and a business invitee who was lawfully in the Wells Fargo Center premises in Philadelphia, Pennsylvania while attending a Justin Bieber concert.

7. At all times material hereto, the Defendants acted by and through their agents, servants, workmen and/or employees all of whom were acting within the scope of their agency and/or authority.

8. At all times material hereto, each of the Defendants had a duty to keep the aforesaid premises free of unreasonably hazardous defects and conditions and safe for business invitees such as the Plaintiff.

9. On the aforesaid date, the Defendants, by and through their agents, servants, workmen and/or employees, knew and/or should have known of the existence of the hazardous condition of the premises as described below.

10. On July 17, 2013, at the time of the Justin Bieber concert, there existed in the walkways of the aforesaid premises, obstructions, defects and irregularities, particularly in the form of electrical cables and/or wires that had been placed or strung about and across the said walkways by the Defendants' agents, servants, workmen or employees that created a danger, menace, nuisance, trap and/or trip hazard to persons lawfully upon said premises.

11. On July 17, 2013, the Plaintiff, **SANDY RICKETTS**, was caused to trip, stumble and fall as a result of coming in contact with the aforementioned defective and hazardous condition then existing upon the aforesaid premises, and to suffer serious injuries more fully hereinafter described.

COUNT I
SANDY RICKETTS vs. DEFENDANTS

12. The averments of paragraphs one (1) through eleven (11), inclusive, are incorporated herein and made a part hereof.

13. The Defendants, individually and/or jointly, by and through their agents, servants, workmen and/or employees, acting in the course of their employment and within the scope of their authority, knew or should have known of the existence of the aforementioned defect prior to the Plaintiff's fall and the Defendants had a duty to correct, remedy, repair, warn of and/or eliminate the said defect.

14. The carelessness and negligence of the Defendants consisted of the following:

- a. Failing to properly inspect the said premises and adjacent areas;
- b. Failing to warn pedestrians of the dangerous condition of the walkway of which the Defendants were aware or should have been aware;
- c. Failing to select and hire competent contractors to maintain the walkways, and/or walking area in said premises;
- d. Failing to maintain the premises and/or walkways in a condition which would protect and safeguard individuals lawfully upon the premises and prevent them from falling;
- e. Allowing and causing the electrical cables or wires on the aforesaid

- premises to extend across walkways and to constitute a menace, danger, nuisance, trap and/or trip hazard to persons lawfully on the premises;
- f. Allowing a condition to exist which was in violation of the ordinances of the municipality and the Commonwealth of Pennsylvania related to safety requirements for walking surfaces;
 - g. Failing to maintain walkways in compliance with the laws of the municipality and the Commonwealth of Pennsylvania;
 - h. Failing to keep the walkways free of defects obstructions and debris;
 - i. Failing to effectively clear the walkways of the above-mentioned area of wires, cables, folding chairs and/or debris before the arrival of business invitees;
 - j. Failing to eliminate the dangerous condition and to guard or warn pedestrians of the hazard at the premises;
 - l. Failing to maintain the premises reasonably free from trip hazards along foreseeable pedestrian paths at, near, or adjacent to the means of ingress and egress to the premises and its seating areas;
 - m. Allowing a condition to exist which was in violation of the ordinances and/or codes of the municipality and/or the Commonwealth of Pennsylvania, and/or applicable national and international codes in relation to walkways on commercial properties and/or properties open to the public;
 - n. Breaching their duty to monitor the site conditions;

- o. Failing to perform reasonable and timely site inspections; and
- p. Failing to appropriately provide ushers or security personnel to assist concert goers who were heading toward their seats.

15. By reason of the aforesaid negligence of the Defendants as stated above, the Plaintiff, **SANDY RICKETTS**, suffered severe and permanent injuries to her person, including but not limited to: left scaphoid fracture; a laceration of her lower lip requiring surgical repair; contusions and sprains of her left wrist and hand; injuries to her teeth; nervous shock and aggravation and/or exacerbation of all known and unknown preexisting medical conditions. The Plaintiff, **SANDY RICKETTS**, suffered severe aches pains, mental anxiety and anguish, and a severe shock to her entire nervous system, and other injuries the full extent of which are not yet known. She has in the past and will in the future undergo severe pain and suffering and will in the future be unable to attend to her usual duties and occupation, all to her great financial detriment and loss. The Plaintiff, **SANDY RICKETTS**, believes and therefore avers that her injuries are permanent in nature.

16. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has been compelled, in order to effectuate a cure for the aforesaid injuries, to expend large sums of money for surgeries, medicine, therapy and medical attention and may be required to expend additional sums for the same purposes in the future.

17. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has been prevented from attending to her usual and daily activities and duties, and may be so prevented for an indefinite time in the future, all to her great financial detriment and loss.

18. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has suffered physical pain and mental anguish and humiliation and she may continue to suffer

same for an indefinite period of time in the future.

WHEREFORE, Plaintiff, **SANDY RICKETTS**, demands damages of the Defendants, jointly and severally herein, in a sum in excess of **FIFTY THOUSAND (\$50,000.00) DOLLARS**, plus costs.

JEFFREY R. LESSIN & ASSOCIATES, P.C.

BY: J effrey R . L esin

**JEFFREY R. LESSIN, ESQUIRE
MARK T. RICHTER, ESQUIRE
Attorneys for Plaintiff**

Date: July 7 , 2015